

### **REMARKS**

Claims 15-20 remain pending in the application, claims 1-14 having been withdrawn from consideration and canceled.

#### **35 USC 112 First Paragraph Rejection of Claims 15-20**

The Examiner rejected claims 15-20 as allegedly failing to comply with the enablement requirement under 35 USC 112.

Although Applicants believe the claim language is supported by the Applicants' specification, claims 15-20 have been carefully reviewed and are amended where appropriate to overcome the rejection. It is respectfully submitted that claims 15-20 are now in full conformance with 35 USC 112. It is respectfully requested that the rejection be withdrawn.

#### **Indefiniteness of claims 15-20 under 2<sup>nd</sup> paragraph of 35 U.S.C. §112**

The Examiner rejected claims 15-20 as allegedly being indefinite under 35 USC 112. In particular, the Examiner alleged that the recited "routing information" is "unclear what type of information is considered routing information. One of ordinary skill in the art does not know what may comprise routing information. A routing information protocol (RIP) is well known in the art, but the specification does not teach implementing such a protocol." The Applicants respectfully disagree.

"Routing information", being a term of art within the network arts that one of ordinary skill would be familiar with, is information related to routing. Even the Examiner's newly relied on reference Haight discloses the term of art "routing information". Routing moves a data packet from point A in a network to point B in a network. "Routing information" may include a MAC address of the source of a data packet, the destination for the data packet, etc. One of ordinary skill in the art would understand that information added to a data packet to allow it to be routed within a network is "routing information".

It is respectfully submitted that claims 15-20 are in full conformance with 35 USC 112. It is respectfully requested that the rejection be withdrawn.

**Claims 15 and 18 over DiFrancisco, Beser, Elliott and Haight**

In the Office Action, claims 15 and 18 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Global Broadcast Service (GBS) End-to-End Services: Protocols and Encapsulation by Michael DiFrancisco et al. ("DiFrancisco") in view of U.S. Patent No. 6,496,867 to Beser et al. ("Beser"), in further view of U.S. Patent No. 7,023,818 to Elliott ("Elliott"), and in further view of European Patent Application No. 1283630A2 to Haight et al. ("Haight"). The Applicants respectfully traverse the rejection.

The Applicants respectfully suggest that the need to combine FOUR references is an indication of the non-obviousness of claims 15 and 18.

Claims 15 and 18 recite providing routing information from a red side router in bulk encrypted data, and routing IP encapsulated, bulk encrypted data, through a **black side router**, from an output port of a portable, deployable communication system over a public Internet.

Thus, claims 15 and 18 recite TWO routers, a red side router and a black side router. The broadest reasonable interpretation cannot be inconsistent with the specification, which illustrates the claimed red side router and a black side router (see, e.g., Figure 2). Hence, "claims are not to be read in a vacuum, and limitations therein are to be interpreted in light of the specification in giving them their 'broadest reasonable interpretation.'" MPEP § 2111.01 at 2100-37 (Rev. 1, Feb. 2000) (quoting In re Marosi, 218 USPQ 289, 292 (Fed. Cir. 1983)(emphasis in original)).

The Examiner relies on Haight to allegedly disclose passing routing information through a red/black routing device at paragraphs 14, 19, 29, 30 and 21 and the Abstract. (see Office Action, page 6) The Applicants respectfully disagree that this teaches the claimed features.

Haight appears to disclose an untrusted router to be used to generate routing information for confidential data. (see Abstract) A trusted guard generates a dummy message by substituting dummy data for confidential data in a message to be routed from a red environment to a black environment. (see Abstract)

Thus, Haight discloses a **SINGLE** router, with the single router being an untrusted router. Haight's untrusted router is an unsecure router which would at best roughly equate to the claimed black side router. Thus, Haight's **SINGLE** unsecure router does NOT disclose, teach or suggest a **red side router**, much less providing routing information from a red side router in bulk encrypted data, and routing IP encapsulated, bulk encrypted data, through a **black side router**, from an output port of a portable, deployable communication system over a public Internet, as recited by claims 15 and 18.

DiFrancisco, Beser, Elliott, and Haight, either alone or in combination, fail to disclose, teach or suggest providing routing information from a red side router in bulk encrypted data, and routing IP encapsulated, bulk encrypted data, through a **black side router**, from an output port of a portable, deployable communication system over a public Internet, as recited by claims 15 and 18.

Accordingly, for at least all the above reasons, claims 15 and 18 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

#### **Claims 16 and 19 over DiFrancisco, Beser, Elliott, Haight and KIV Family**

In the Office Action, claims 16 and 19 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over DiFrancisco, Beser, Elliott, Haight and in further view of KIV-7 Family article ("KIV Family). The Applicants respectfully traverse the rejection.

The Examiner alleged that a hard copy of the KIV Family reference was submitted to the Applicants on July 12, 2007. (see Office Action, page 3) However, that was **not** the case. The PTO-892 attached to the Office Action dated July 12, 2007 listed the KIV Family reference **without** providing a **hard copy**. Instead, a web site is indicated where to retrieve the reference. Applicants retrieved a copy of KIV Family from the web site given by the Examiner. KIV Family's self-identified publication date has been **removed** since the last time Applicants view the web site. A continuously **changing** web site

does not provide a concrete publication date, with the latest data NOT showing a publication data at all. Thus, KIV Family as officially provided does not pre-date the Applicants' priority date of August 20, 2003, KIV Family being improperly applied against Applicants' claims.

The Applicants respectfully suggest that the need to combine FIVE references is an indication of the non-obviousness of claims 16 and 19.

Claims 16 and 19 are dependent on claims 15 and 18, and are allowable for at least the same reasons as claims 15 and 18.

Claims 16 and 19 recite providing routing information from a red side router in bulk encrypted data, and routing IP encapsulated, bulk encrypted data, through a **black side router**, from an output port of a portable, deployable communication system over a public Internet.

DiFrancisco, Beser, Elliott and Haight, either alone or in combination, fail to disclose, teach or suggest providing routing information from a red side router in bulk encrypted data, and routing IP encapsulated, bulk encrypted data, through a **black side router**, from an output port of a portable, deployable communication system over a public Internet, as recited by claims 16 and 19.

Accordingly, for at least all the above reasons, claims 16 and 19 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

#### **Claims 17 and 20 over DiFrancisco, Beser, Elliott, and ViaSat**

In the Office Action, claims 17 and 20 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over DiFrancisco, Beser, and Elliott, in further view of KIV-21 ViaSat IP Crypto ("ViaSat"). The Applicants respectfully traverse the rejection.

The Examiner alleged that a hard copy of the ViaSat reference was submitted to the Applicants on July 12, 2007. (see Office Action, page 3) However, that was not the case. The PTO-892 attached to the Office Action dated July 12, 2007 listed the ViaSat reference without providing a hard copy.

Instead, a web site is indicated where to retrieve the reference. When accessing the Examiner's listed web site, we instead received the error "The page you are looking for cannot be found (Error 404)" in an attempt to retrieve the ViaSat reference. Thus, it appears that the alleged ViaSat reference is not publicly available. In any event, it is impossible for the Applicants to address the ViaSat reference as it is not publicly available from the source given by the Examiner.

The Applicants respectfully suggest that the need to combine FIVE references is an indication of the non-obviousness of claims 17 and 20.

Claims 17 and 20 are dependent on claims 15 and 18, and are allowable for at least the same reasons as claims 15 and 18.

Claims 17 and 20 recite providing routing information from a red side router in bulk encrypted data, and routing IP encapsulated, bulk encrypted data, through a **black side router**, from an output port of a portable, deployable communication system over a public Internet.

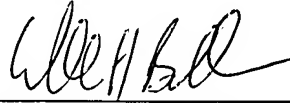
DiFrancisco, Beser, Elliott and Haight, either alone or in combination, fail to disclose, teach or suggest providing routing information from a red side router in bulk encrypted data, and routing IP encapsulated, bulk encrypted data, through a **black side router**, from an output port of a portable, deployable communication system over a public Internet, as recited by claims 17 and 20.

Accordingly, for at least all the above reasons, claims 17 and 20 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Conclusion**

All objections and/or rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,



---

William H. Bollman  
Reg. No.: 36,457  
Tel. (202) 261-1020  
Fax. (202) 887-0336

**MANELLI DENISON & SELTER PLLC**

2000 M Street, N.W. 7<sup>th</sup> Floor  
Washington D.C. 20036-3307  
WHB/df